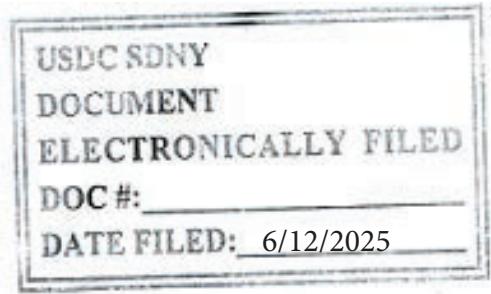


MEMO ENDORSED

JEFFREY LICHTMAN  
 JEFFREY EINHORN  
 MATTHEW COHAN

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June 4, 2025

**BY ECF**

Hon. Nelson S. Román  
 United States District Judge  
 Southern District of New York  
 300 Quarropas St.  
 White Plains, New York 10601

**Re: United States v. Trijya Vakil, 25 CR 226 (NSR)**

Dear Judge Román:

I am writing on behalf of defendant Trijya Vakil to respectfully request a modification of the defendant's conditions of release which would permit her to travel to the Czech Republic from June 15, 2025 through June 19, 2025 in order to participate in a presentation for her employer, Merck Animal Health. Ms. Vakil's pre-trial officer, Simon Krivoruk, has objected to this request due to the short period of time that Ms. Vakil has been on pre-trial release, and the government, by AUSA James McMahon, consents to the request on the condition that Ms. Vakil's 10-year-old son's passport is provided to Pretrial Services in exchange for hers, which she will need returned to her should this application be approved. Ms. Vakil's suretor has also consented to this request.

See p.2

By way of background, on May 19, 2025, Ms. Vakil was released by Magistrate Judge Judith McCarthy on a \$200,000 personal recognizance bond signed by one financially responsible person, with travel limited to the Southern and Eastern Districts of New York, the Eastern District of Pennsylvania, and the District of New Jersey. In the time since her voluntary surrender and release, Ms. Vakil has remained compliant with her conditions of release. Further, Ms. Vakil pled guilty pursuant to a plea agreement which contained a stipulated Guidelines range of only 8 to 14 months imprisonment, which resides in Zone B of the Sentencing Table.

JEFFREY LICHTMAN

Hon. Nelson S. Román  
United States District Judge  
June 4, 2025  
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Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: James McMahon, Esq.  
Assistant United States Attorney (by email & ECF)

**Defendant's request for a temporary modification of her bail conditions permitting her to travel to the Czech Republic on June 15, 2025 through June 19, 2025 is GRANTED over Pretrial Services' objection and with the Government's suggestion that Defendant first provide Pretrial Services with her 10-year-old son's**

So Ordered:



Hon. Nelson S. Román, U.S.D.J.

**passport in exchange for her passport AND that Defendant is not permitted to obtain a replacement. Clerk of Court is requested to terminate the motion at ECF No. 7.**

Dated: White Plains, NY

June 12, 2025